

REMARKS

This is intended as a full and complete response to the Final Office Action dated March 12, 2003, having a shortened statutory period for response set to expire on June 12, 2003. Claims 1, 2, and 4-24 are pending in the application. Claim 23 has been amended to correct matters of form. Claims 6-9 and 15-16 have been cancelled without prejudice. Claims 11, 12, and 19-24 are allowed. New claims 25-26 have been added. No new matter has been added. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 2, 4, 5 and 10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Callihan et al.* (U.S. Patent Number 4,413,682). The Examiner states that *Callihan et al.* discloses a cementing shoe having a housing for disposal at the end of a tubing string. The Examiner uses number 2 of *Callihan et al.* as the housing, and number 10 as the cement shoe. The Examiner states that the housing of *Callihan et al.* has an enlarged diameter opposite the number 26 near its lower end. The Examiner then states that the cement shoe is disposed in the housing and is drillable.

Applicants respectfully traverse the rejection of claims 1, 2, 4, 5, and 10. Number 2 of *Callihan et al.*, as shown in Figures 3-5, does not have an enlarged inner diameter at its lower end. In fact, in Figure 4, the inner diameter of the housing actually decreases from the inner diameter encountered at upper portions of the housing, namely at the portion of 2 around numbers 22 and 26, to the lower end of the housing across from the number 34. Therefore, *Callihan et al.* does not teach, show, or suggest a tubular housing having an enlarged inner diameter portion at a lower end of the housing, as recited in claim 1, 2, 4, 5, and 10. Accordingly, Applicants respectfully request allowance of claims 1, 2, 4, 5, and 10.

Claims 6-9 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have rewritten claims 6-9 as claims 19-22, which have been allowed, and Applicants have cancelled claims 6-9 without prejudice.

Claims 13 and 14 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Gano et al.* (U.S. Patent Number 6,135,208). Claims 17 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Gano et al.* in view of *Simpson* (U.S. Patent Number 6,457,532 B1). The Examiner states that *Gano et al.* discloses in Figure 7 a first tubing having an enlarged lower end and a second tubing that is to be expanded into the first tubing. The Examiner uses number 282 of *Gano et al.* to designate the first tubing and number 266 to designate the second tubing. Regarding claims 17 and 18, the Examiner states that *Gano et al.* discloses all of the claimed features except for the expansion member being a hydraulically operated expansion member having expanding means. The Examiner states that *Simpson* discloses an expander that has rollers pressed outwardly by hydraulic pressure, and considers it obvious to replace the expander of *Gano et al.* with the expander of *Simpson*.

Applicants respectfully traverse the rejection of claims 13, 14, 17, and 18. Number 282 of Figure 7 is referred to in *Gano et al.* as a tubular member. Number 266 designates a sealing device which includes a tubular member 270 and a sealing material 274 placed on the outer surface of the tubular member 270. See Figure 7 and col. 15, lines 15-21. As shown in Figure 7, the sealing material 274 is in contact with the inner surface of the tubular member 282, but the tubular member 270 does not contact the tubular member 282. Therefore, *Gano et al.* does not teach, show, or suggest a second tubular having an expanded diameter in contact with the inside surface of the first tubular, as recited in claim 13 and its dependent claim 14. Likewise, *Gano et al.*, alone or in combination with *Simpson et al.*, does not teach, show, or suggest a method of forming a connection in a wellbore between a first, larger diameter tubular and a second, smaller diameter tubular without enlarging the diameter of the first tubular, wherein an outer surface of the second tubular expands outward to meet and frictionally contact the enlarged inside diameter portion, as recited in claim 17. Furthermore, *Gano et al.*, alone or in combination with *Simpson et al.*, does not teach, show, or suggest a method of forming a connection between two wellbore tubulars comprising expanding the first end of the first tubular using an expander tool with radially extendable members, such that the outer diameter comes into connecting

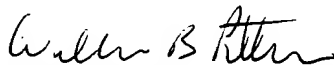
contact with the enlarged inner diameter portion, as recited in claim 18. Accordingly, Applicants respectfully request allowance of claims 13, 14, 17, and 18.

Claims 15 and 16 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have cancelled claims 15 and 16 and rewritten the claims, with changes as to matters of form, as claims 25 and 26. Accordingly, Applicants respectfully request allowance of claims 25 and 26.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or apparatus of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request allowance of the claims.

The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Accordingly, allowance of the claims is respectfully requested.

Respectfully submitted,



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